

OPERABLE UNIT #1 RI WORK PLAN ADDENDUM
U.S. DOE FERNALD
OHD 890 008 976

DOCUMENT DATE 01-21-91



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

2462

JAN 21 1991

REPLY TO ATTENTION OF:

Mr. Andrew P. Avel
United States Department of Energy
Feed Materials Production Center
P.O. Box 398705
Cincinnati, Ohio 45239-8705

5HR-12

RE: Operable Unit #1
RI Work Plan Addendum
U.S. DOE Fernald
OHD 890 008 976

Dear Mr. Avel:

On July 26, 1990, the United States Department of Energy (U.S. DOE) submitted an addendum to the Remedial Investigation (RI) work plan for the Feed Materials Production Center in Fernald, Ohio. This addendum proposed additional sampling for Operable Unit (OU) #1 - Waste Pit Area (pits 1-6, clear well, burn pit). Based on United States Environmental Protection Agency (U.S. EPA) comments of August 27, 1990, U.S. DOE revised the sampling proposal and submitted it to U.S. EPA on September 26, 1990. U.S. EPA reviewed the revised sampling plan and granted verbal approval of the document on October 24, 1990, so that field work could be initiated. Written approval was given in a October 25, 1990, letter. This work plan was not implemented.

On November 15, 1990, U.S. DOE submitted another work plan for this sampling. U.S. EPA approved this work plan on November 25, 1990. This work plan was not implemented.

On December 21, 1990, U.S. DOE submitted another work plan. U.S. EPA is approving this work plan. U.S. DOE must implement the approved work plan.

In a January 15, 1991, project managers meeting, U.S. DOE informed U.S. EPA that the work plan may be modified again and that the lack of funds and problems with contracts may prevent the work from going forward.

The RI report for Operable Unit #1 is required to be submitted to U.S. EPA by February 18, 1991. U.S. DOE presented the above RI work plan addendums because the characterization work done under the Characterization Investigation Study (CIS) was not adequate to support the Feasibility Study (FS) and Remedial Design (RD).

JAN 21 1991

E-1385

Printed on Recycled Paper

1

U.S. DOE is required by the 1990 Consent Agreement to submit an adequate RI report. U.S. DOE has presented the above work plan addendums as work that is required for the RI and U.S. EPA agrees with this conclusion. Due to U.S. DOE's failure to implement earlier approved work plans, U.S. DOE will not have analytical results by the RI Report due date. There is no technical reason for this work not to have been performed. U.S. DOE must propose a solution to this problem. An inadequate RI report should not be submitted by U.S. DOE.

If you have any questions, please contact me at (312) 886-4436.

Sincerely,



Catherine A. McCord
Remedial Project Manager

cc: Acting Director, OEPA
Graham Mitchell, OEPA - SWDO
Leo Duffy, U.S. DOE - HDQ
Joe LaGrone, U.S. DOE - ORO

bcc: David A. Ullrich, WMD -->William E. Muno -->Kevin Pierard
Mary Butler, ORC
Len Robinson, ORC
Peg Andrews, OE
Sandra Lee, ORC
David Kee, ARD
Dan O'Riordan, OPA
Ed Schuessler, PRC

DOE Disk #5:OU#1-sam.3